

## **Technical Review and the Evaluation of the Application for Air Quality Minor Permit Revision Number 41833**

### **I. INTRODUCTION**

This Class I Minor Revision is being issued to Phelps Dodge Morenci, Inc., the Permittee, for revising the timeline for implementing monitoring and performance testing requirements for sources not yet constructed at their mine site. The facility is located in Morenci, Greenlee County, Arizona. The facility was issued a significant revision #36424 on March 10, 2006, to Class I permit #M110734P1-99, for re-location of in pit crusher #2, re-start of Morenci Concentrator, installation of a new lime slaking plant, and installation of new concentrate leach plant to their mine facility.

Significant Revision #36424 required the Permittee to conduct one certified Method 9 observation on the stack of affected units for establishing baseline opacity within 180 days of issuance of Significant Revision #36424. Further, Permittee was required to conduct performance tests for particulate matter on the affected units within six months of restart of Morenci Operations. There have been some delays in the commissioning and start up of certain affected units. In view of this, the time line for above requirements is being changed “from within 180 days from issuance of significant revision” to “within 60 days after the affected unit achieves the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial startup” in accordance with A.A.C. R18-2-312.

### **II EMISSIONS**

There is no change in the emission from the source.

### **III. PERIODIC MONITORING**

No changes in the frequency of periodic monitoring are occurring as part of this minor revision. Since the Permittee has not been able to commission the affected units within 180 days of issuance of significant revision #36424, therefore the requirement of conducting initial test for baseline reading has been changed to within 60 days after the affected units have achieved the maximum production rate but no later than 180 days after initial start-up.

### **IV. TESTING REQUIREMENTS**

No changes in the frequency of testing requirements are being made as part of this minor revision. Since the Permittee has not been able to commission the affected units within 6 months of restart of Morenci Operations, therefore the requirement of conducting performance test has been changed to within 60 days after the affected units have achieved the maximum production rate but no later than 180 days after initial start-up.

### **V. MINOR REVISION GATEKEEPERS**

The Department has determined that this revision meets the requirements of a minor

revision. Each minor revision trigger is listed below along with a discussion of why this revision meets those triggers.

1. Does not violate any applicable requirement;

There are no changes to any of the applicable requirements as a result of the change.

2. Do not involve substantive changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

There are no changes to monitoring, reporting, or recordkeeping requirements as a result of the change.

3. Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

The revision does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis.

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. The terms and conditions include:

- a. A federally enforceable emission cap that the source would assume to avoid classification as a modification under any provision of Title I of the Act; and
- b. An alternative emission limit approved under regulations promulgated under the Section 112(i)(5) of the Act.

The revision does not establish or change a permit term or condition.

5. Are not modifications under any provision of Title I of the Act;

The change is not a modification under any provision of Title I of the Act.

6. Are not changes in fuels not represented in the permit application or provided for in the permit;

There are no changes in fuels associated with this minor revision.

7. The increase in the source's potential to emit any regulated air pollutant is not significant as defined in R18-2-101;

The revision does not increase the potential to emit of any regulated pollutant above the significance level as listed in A.A.C. R18-2-106.

8. Are not required to be processed as a significant revision under R18-2-320.

A.A.C. R18-2-320 does not require this revision to be processed as a significant revision.